

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Randy J. Spencer,	:	CIVIL ACTION
Plaintiff,	:	
	:	No. 1:23-cv-00036
v.	:	
	:	
Matt McSparren, Bob Betzold, Fred	:	
Buckholtz, Regina Deloe, Township	:	
Of Cranberry, and Eric Heil,	:	(electronically filed)
Defendants	:	JURY TRIAL DEMANDED

**JOINT MOTION FOR EXTENSION OF TIME TO COMPLETE EARLY
NEUTRAL EVALUATION AND TO EXTEND CASE MANAGEMENT
DEADLINES**

Plaintiff, Randy J. Spencer, and Defendants, Matt McSparren, Bob Betzold, Fred Buckholz, Regina Deloe, Township of Cranberry and Eric Heil file this Joint Motion for Extension of Time, and in support thereof respectfully avers:

1. This Honorable Court issued a scheduling Order requiring the parties to complete the ADR Process on or before September 23, 2023.
2. Due to scheduling conflicts and the complexity of this case, the parties are requesting an extension to complete the Early Neutral Evaluation.
3. The parties and the early neutral evaluator have identified two dates for completion of the Early Neutral Evaluation: October 30, 2023 and November 6, 2023.
4. Therefore, the parties respectfully request to extend the deadline to complete the Early Neutral Evaluation until November 7, 2023.

5. For the same reasons, the parties are making their first request to extend the current case management deadlines by ninety (90) days.

6. Both Plaintiff and Defendants concur in the requested extension.

7. The parties do not anticipate the need for an additional extension of time to complete the Early Neutral Evaluation or to complete fact discovery.

8. The parties have attached a proposed Order for the Court's consideration.

WHEREFORE, the parties respectfully request that this Honorable Court grant the requested extension to complete the Early Neutral Evaluation until November 7, 2023 and to extend the current Case Management Deadlines by ninety (90) days.

Respectfully submitted,

Lavery Law

DATE: September 21, 2023

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DATE: September 21, 2023

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